



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029**

**MAR 22 2017**

**ELECTRONIC MAIL  
RETURN RECEIPT REQUESTED**

Dan Gallagher, Manufacturing Manager  
Sunoco Race Fuels  
100 Green Street  
Marcus Hook, PA 19061

**Re: Recommendation Status for the Sunoco Race Fuels in Marcus Hook, PA**

Dear Dan Gallagher:

The purpose of this letter is to inform you that EPA issued recommendations to improve the safety of the Facility's petroleum refineries process in a letter sent to the Facility on July 19, 2016 based upon a prior RMP/GDC inspection on June 30, 2016. The recommendation(s) were as follows:

1. On the next RMP Submission:
  - a. Remove butane from RMP with next submission, as butane tank onsite has capacity less than threshold quantity.
  - b. Update the worst case release scenario to the minimum distance of 0.1 miles and include the population within that distance.
  - c. Update the latitude and longitude to a location closer to the process area.
2. In regards to detectors:
  - a. Add an "as found" column to detector calibration logs to assist in sensor drift recognition.
  - b. Check the correction factors for the different hydrocarbons in the blend plant and determine what the alarm set points should be with these in consideration.
3. Expedite the installation of remote isolation valves for the isopentane tank.
4. Consider installing emergency interlock system to shut off the pump power in response to high-high level tank alarms.



Although we have received confirmation that recommendation one (1) is scheduled for completion with the next RMP update, recommendations two (2) through four (4) are still outstanding.

While the Facility is not required to implement the outstanding "good engineering practices" recommendation(s), EPA encourages the Facility to implement the recommendation(s), as doing so will help the Facility meet the goals of the risk management program, *i.e.* to prevent accidental releases of chemicals that could cause serious harm to human health or the environment and reduce the severity of releases that may occur.

Should you have any questions on this matter, please contact me at 215-814-3269.

Sincerely,



Ashley Nilsen, RMP Coordinator  
Chemical Accident Prevention Program  
Oil and Prevention Branch

cc: Michael Welsh (3HS61)

